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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** ALL PAPERS SHALL BE FILED IN THE
LEAD CASE, NO. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY
DEFAULT ON MOTION FOR ENTRY OF
AN ORDER FURTHER EXTENDING
DEADLINE FOR THE REORGANIZED
DEBTORS TO OBJECT TO CLAIMS AND
FOR RELATED RELIEF**

[Re: Docket No. 14435]

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized
3 debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned
4 chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the
5 Bankruptcy Local Rules for the United States District Court for the Northern District of California,
6 as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain*
7 *Notice and Case Management Procedures* entered on May 14, 2019 [Docket No. 1996] (“**Case**
8 **Management Order**”), that the Court enter by default an order, after review of the merits,
9 approving the relief sought in the *Motion for Entry of an Order Further Extending Deadline for the*
10 *Reorganized Debtors to Object to Claims and for Related Relief* filed by the Reorganized Debtors
11 on April 30, 2024 [Docket No. 14435] (the “**Motion**”).¹

12 **RELIEF REQUESTED IN THE MOTION**

13 The Motion seeks entry of an order: (i) further extending the deadline established under the
14 Plan for the Reorganized Debtors to object to General Claims by an additional one hundred eighty
15 (180) days, through and including December 16, 2024, without prejudice to the Reorganized Debtors’
16 right to seek additional extensions thereof; and (ii) granting related relief. A proposed order (the
17 “**Proposed Order**”) was attached as Exhibit A to the Motion.

18 **NOTICE AND SERVICE**

19 A notice of hearing on the Motion was filed on April 30, 2024 [Docket No. 14437] (the “**Notice**
20 **of Hearing**”). The Motion, the Notice of Hearing, and the supporting declaration of Robb C.
21 McWilliams [Docket No. 14436] were served as described in the Certificate of Service of Liz
22 Santodomingo, filed on May 7, 2024 [Docket No. 14444]. The deadline to file responses or
23 oppositions to the Motion has passed, and no responses or oppositions have been filed with the Court
24 or received by counsel for the Reorganized Debtors.

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28 ¹ Capitalized terms not herein defined shall have the meanings given to them in the Motion.

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1. I am an attorney with the firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors.

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